

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT OPPORTUNITY)	
COMMISSION,)	
)	Civil Action No. 05-CV-00697
Plaintiff,)	(SLR)
)	
v.)	
)	PLAINTIFF EEOC'S FIRST SET
BE&K ENGINEERING COMPANY,)	OF INTERROGATORIES
(SUBSIDIARY OF BE&K, INC.))	
)	
Defendant.)	

**BE&K ENGINEERING COMPANY'S ANSWERS TO
PLAINTIFF EEOC'S FIRST SET OF INTERROGATORIES**

General Responses & Objections

1. Defendant objects to any and all Interrogatories to the extent they seek the disclosure of information or documents protected by the attorney-client and/or work product privileges.

2. Defendant objects to any and all Interrogatories to the extent they seek information not relevant to the subject matter of this action and information not reasonably calculated to lead to the discovery of admissible evidence.

3. Defendant objects to any and all Interrogatories to the extent they require them to respond in any other way than as required by F.R.C.P. 33.

Each of the responses provided below are subject to the general responses and objections outlined herein. Defendant reserves the right to supplement these interrogatories as additional responsive non-privileged information becomes available.

Answers

INTERROGATORY NO. 1:

State the full factual basis for Defendant's decision to terminate Juan Obed Perez from his employment on or about November 21, 2003, and state the name, address, business telephone number, job title and age of each and every person responsible for, or who had any involvement whatsoever in the recommendation and/or and decision to terminate Mr. Perez from his employment.

ANSWER: Defendant objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Plaintiff is directed to Defendant's previously produced Initial Disclosures and to Defendant's position statement.

INTERROGATORY NO. 2:

Provide a list of all persons employed at Defendant's Newark, DE facility since January 1, 2000 to the present, by name, date of hire, job title, address and telephone number, and age.

ANSWER: Defendant objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Plaintiff is directed to Defendant's previously produced Initial Disclosures which contain responsive documents relating to employees in the Process Department.

INTERROGATORY NO. 3:

Identify all individuals terminated, laid off, discharged, or otherwise separated from [sic] between the time of January 1, 2000 and the present. For each individual identified, specify their position at the time of termination; their reason for termination; their last known address; date of hire; telephone number; age; and if applicable, age of the employee who replaced them.

ANSWER: Defendant objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Plaintiff is directed to Defendant's previously produced Initial Disclosures which contain responsive documents relating to employees in the Process Department.

INTERROGATORY NO. 4:

Does Defendant contend that Juan Obed Perez's performance while employed by BE&K was less than satisfactory? If so, please provide any and all reasons to support Defendant's contention.

ANSWER: Defendant objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Plaintiff is directed to Defendant's previously produced Initial Disclosures, which contain information relevant to Juan Obed Perez's performance while employed by BE&K.

INTERROGATORY NO. 5:

Set forth in full and complete detail the full factual knowledge of the individuals identified in Defendant's Rule 26 (a) Disclosures, including but not limited to who has knowledge of any occurrence, event, fact or circumstances either upon which any of your defenses are founded, and/or which relate to the allegations in the Complaint, specifying the occurrence, or circumstance each such person was a witness or has knowledge thereof and state the name and address of each person.

ANSWER: Defendant objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory to the extent it seeks production of attorney-client privileged or attorney work

product information. Subject to and without waiving the foregoing objections, Plaintiff is directed to Defendant's previously produced Initial Disclosures.

INTERROGATORY NO. 6:

State whether you intend to rely upon any statements obtained from any person or entity not a party to this action; and if so, state the identity of the person or entity making such statements, the substance of the statement, to whom it was made and identify and **attach** all documents containing such statements.

ANSWER: Defendant objects to this interrogatory on the grounds that it is premature at this early stage of the litigation and to the extent it seeks to invade the litigation strategy of Defendant's counsel. Defendant further objects to this interrogatory to the extent it seeks production of attorney-client privileged or attorney work product information. Subject to and without waiving the foregoing objections, Defendant responds that, at this time, it does not intend to rely on any non-party statements. Defendant reserves the right to amend this response as the parties move towards trial. Subject to and without waiving the foregoing objections, Defendant may call witnesses identified in Defendant's previously produced Initial Disclosures and in Plaintiff's previously produced Initial Disclosures.

INTERROGATORY NO. 7:

Identify each person who will be or may be called to testify on behalf of Defendant at trial of this matter. For each such person, state the individual's name, address, telephone number, title and position, dates of employment at such position, substance of person's anticipated testimony, subjects which the person is expected to address; and all documents, studies, data or other evidence on which the person is expected to rely (and **attach** copy of same).

ANSWER: Defendant objects to this interrogatory on the grounds that it is premature at this early stage of litigation and to the extent it seeks to invade the litigation strategy of